

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT**

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SCOTT TRAUDT,

Plaintiff,

v.

ARI RUBENSTEIN, GTS SECURITIES  
LLC, GTS EQUITY PARTNERS LLC,  
GTS EXECUTION SERVICES LLC,  
CHARLES W. SCHWAB AND CO. INC.,  
SCHWAB HOLDINGS, INC., and  
FINANCIAL INDUSTRY  
REGULATORY AUTHORITY,

Defendants,

and

GARY GENSLER, US SECURITIES  
AND EXCHANGE COMMISSION,

Respondents.

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Docket No.: 2:24-cv-782

Judge Christina Reiss

**GTS EQUITY PARTNERS LLC AND GTS EXECUTION SERVICES LLC’S  
RESPONSE TO PLAINTIFF’S MOTION FOR ENTRY OF FINAL JUDGMENT**

GTS Equity Partners LLC and GTS Execution Services LLC (together, the “Additional GTS Entities”) agree that final judgment should be entered in this case. They submit this partial response to Plaintiff’s motion for entry of judgment, Dkt. No. 153, to address the scope of the relief requested by Plaintiff.

By way of background, Plaintiff’s initial complaint and subsequent pleadings identified the Additional GTS Entities as defendants in the case caption, but made no substantive allegations against them. The Court’s June 30, 2025 Order Denying Plaintiff’s Motion for Leave to File Second Amended Complaint (“SAC”) identified the Additional GTS Entities as defendants on the SAC and denied leave to amend. *See* Dkt. No. 149 at 1. As such, for the purposes of finality, any judgment entered pursuant to Plaintiff’s motion should also be in their favor. *See* 10 Moore’s

Federal Practice § 54.22 (“If the district court enters judgment on something less than a final disposition of an entire claim, the Rule 54(b) judgment is improper, and the court of appeals is without jurisdiction to hear the appeal. Such a non-final ruling is an inherently interlocutory order that may not be made appealable under Rule 54(b).”).

Counsel asked Plaintiff for his position on this technical matter by noon on September 24, and as of this filing, has not received it.

WHEREFORE, the Additional GTS Entities respectfully request that they be included in any judgment entered pursuant to Plaintiff’s motion, Dkt. No. 153.

Dated: September 24, 2025

Respectfully submitted,

/s/ Jonathan R. Voegele

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LLC, GTS Execution Services LLC*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed electronically today via the Court's CM/ECF Electronic Filing System. A Notice of Electronic Filing will be sent by e-mail to all parties via operation of the Court's CM/ECF Electronic Filing System or by mail to anyone unable to accept electronic filing as indicated on the Notice.

Dated: September 24, 2025

/s/ Jonathan R. Voegele